REMARKS

In view of the following remarks, Applicants respectfully request reconsideration and allowance of the subject application. Claims 11-17 are canceled without prejudice. Claims 1, 3 and 6 are currently amended. Claims 2, 4, 5 and 7-10 are original. Claims 18-27 are new. Claims 1-10 and 18-27 are pending.

The §103 Rejections

Applicants submit that the Office has failed to establish a prima facie case of obviousness and respectfully traverse the Office's rejections of Claim 1-10. However, before discussing the substance of the Office's rejection a section entitled "The §103 Standard" is provided and will be used in addressing the Office's rejections. Following this section, a discussion of the disclosure and teachings of the relied upon references is provided.

The §103 Standard

To establish a *prima facie* case of obviousness, three basic criteria *must* be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992); *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir.

1988). Second, there must be a reasonable expectation of success. *In re Merck &*
Co., Inc., 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986). Finally, the prior art
reference (or references when combined) must teach or suggest all the claim
limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).

Hence, when patentability turns on the question of obviousness, the search for
and analysis of the prior art includes evidence relevant to the finding of whether there
is a teaching, motivation, or suggestion to select and combine or modify the
references relied on as evidence of obviousness. The need for specificity pervades
this authority. *See*, e.g., *In re Kotzab*, 217 F.3d 1365, 1371, 55 USPQ2d 1313, 1317
(Fed. Cir. 2000) ("particular findings must be made as to the reason the skilled artisan,
with no knowledge of the claimed invention, would have selected these components
for combination in the manner claimed").

The Gutman Reference

Generally, Gutman discloses a technique for integrating authentication
authorization and accounting service and proxy service for internet service provides
(ISP) that support wholesale and retail users. See: Title; Abstract; and Col. 1, line 14
through col. 2, line 63. In operation, Gutman teaches that the proxy server of an ISP
receives a network address request from a user. The proxy server parses the network
access request for an identification of the user's domain. If the user's domain
corresponds to that of the ISP, the network access request is routed to the

Authentication, Authorization and Accounting (AAA) server of the ISP. If the user's domain does not correspond to that of the ISP, the network access request is proxyed out to the AAA server in the user's domain, at an address and port specified in a domain identification entry maintained in a database by the ISP. The appropriate AAA server then authenticates the user and indicates the user's authorization to access the network. See: col. 10, lines 32-62; col. 1, lines 41-45; and col. 1, line 62 through col. 2, line 10.

Thus, the focus of Gutman's disclosure is a technique for securely routing the network access request of a user to the appropriate AAA server based upon the user's domain.

The Vu Reference

Generally, Vu discloses a technique for providing an internetwork security gateway. In operation, Vu teaches that the gateway provides for communication between a client and a requested host by coordinating communication between two distinct but interdependent communication sessions. Upon receiving a request from a user to communicate with a host, the gateway imitates the host in a first communication session with the client. If the client is determined to have access right to the host, the gateway imitates the client in a second communication session with the host. See: Abstract; and col. 5, lines 16-30.

Thus, the focus of Vu's disclosure is a technique for providing a transparent

firewall between a client and a remote host, without revealing the client's address to

the remote host.

The Higley Reference

Generally, Higley discloses a technique for allowing a source to obtain the

rights of a target object to access one or more objects in a distributed directory. In

operation, Higley teaches that the source logs into a distributed directory as a source

object. Having logged in as the source object, the source obtains the access rights of

the source object, including the authorization to access the target object and to modify

the authentication data of the target object. The source then generates new

authentication data, such as a random password and a new private/public key pair.

Thereafter, the source accesses the target object by using the rights of the source

object. The source accesses the target object to modify the authentication data of the

target to include the new authentication data. Modifying the authentication data of the

target enables the source to obtain the access right of the target object. Thus, the

source may log into the distributed directory using the new authentication data and

obtaining the access right of the target object. Thereafter, the source becomes a proxy

for the target object and thereby obtains the access rights of the target object. See:

Abstract; and col. 5, line 26 through col. 6, line 24.

Thus, the focus of Higley's disclosure is a technique for obtaining the access rights of a target object by allowing the source to modify the authentication data of the target object.

The Subramaniam Reference

Generally, Subramaniam discloses a technique for providing secure access to a network from an external client. In operation, Subramaniam teaches that the request for access to confidential data is redirected from a target server to a boarder server. After being redirected to a boarder server, a secure socket layer connection between the boarder server and the external client is utilized to carry user authentication information. Thereafter, the access request may be redirected back to the original target server. Subramaniam further teaches that web pages sent from the target server to the external client are scanned for non-secure uniform resource locators, which are then modified to maintain use of the secure socket layer connection. See: Abstract; and col. 14, line 50 through col. 16, line 15.

Thus, the focus of Subramaniam's disclosure is a technique for securely authenticating an external client and then modifying the non-secure content of communications between the network and the external client to maintain a secure communication link.

Response to the §103 Rejections

Claims 1 and 2 stand rejected under 35 U.S.C. § 103 as being obvious in view of the combination of U.S. Patent No. 6,298,383 to Gutman and U.S. Patent No. 5,623,601 to Vu. In response, the Applicants respectfully traverse the rejection.

Claim 1, as amended, recites a method of enabling a proxy client in a secured network to access a target service on behalf of a user, comprising the steps of:

- registering proxy authorization information regarding the user with a trusted security server, **the proxy authorization information identifying the proxy client and an extent of proxy authorization granted the proxy client by the user;**

- submitting, by the proxy client, a proxy request to the trusted security server requesting access to the target service on behalf of the user;

- comparing, by the trusted security server, the proxy request with the registered proxy authorization information of the user to determine whether to grant the proxy request;

- issuing, by the trusted security service, a data structure containing authentication data recognizable by the target service for authenticating the proxy client for accessing the target service on behalf of the user, if it is determined to grant the proxy request.

Gutman does not teach or suggest "registering proxy authorization information regarding the user with a trusted security server, the proxy authorization information identifying the proxy client and an extent of proxy authorization granted the proxy client by the user." Instead, Gutman discloses transferring authentication of the user from the ISP to the owner of the user (e.g., the ISP or the user's domain) at col. 1, lines 41-45. At col. 1 line 41 through col. 2 line 4, Gutman discloses a specific implementation of transferring authentication of the user from the ISP's proxy server to the Authentication, Authorization and Accounting (AAA) server in the user's domain (e.g., Corp A). Specifically, the network access request from a user is parsed for an identification of the user's domain. The network access request is proxyed to an AAA service in the user's domain at an address and port as specified in a domain identification entry.

As part of proxying out the authentication transaction, the AAA server provisions an IP address or a pool identifier of an IP address pool from which an IP address needs to be allocated for the ISP to use. The ISP maintains information (e.g., domain identification entries), such as supported domain names, the IP address to which the proxy authentication transaction is to be sent, and the port number to which the proxy authentication transaction is to be sent. The IP address provisioned by the AAA server and the domain identification entries maintained by the ISP are utilized by the ISP for authenticating the user (col. 2, lines 6-10) and granting access to the

user to access the network (col. 2, lines 2-4). Accordingly, the information grants access to the user not the proxy server of the ISP.

Thus, Gutman does not teach or suggest "registering proxy authorization information regarding the user with a trusted security server, the proxy authorization information identifying the proxy client and an extent of proxy authorization *granted the proxy client* by the user." Furthermore, Vu has not been shown to teach or suggest "registering proxy authorization information regarding the user with a trusted security server, the proxy authorization information identifying the proxy client and an extent of proxy authorization granted the proxy client by the user." Applicants therefore respectfully submit that Claim 1 is patentable over, Gutman, Vu and the combination thereof. Accordingly, Applicants request that the §103(a) rejection of Claim 1 be withdrawn and Claim 1 be allowed.

Claim 2 is dependent upon Claim 1 and incorporates all the limitations of Claim 1. Accordingly, Claim 2 is allowable by virtue of its dependency on respective base Claim 1, as well as the additional elements it recites. Applicants therefore request that the §103(a) rejection of Claim 2 be withdrawn and Claim 2 be allowed.

Claims 3-8 and 10 stand rejected under 35 U.S.C. § 103 as being obvious in view of the combination of U.S. Patent No. 6,298,383 to Gutman, U.S. Patent No. 5,623,601 to Vu and U.S. Patent No. 5,913,025 to Higley. In response, the Applicants respectfully traverse the rejection.

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PAGE 18/22 * RCVD AT 11/22/2005 5:14:34 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-6/32 * DNIS:2738300 * CSID:15093238979 * DURATION (mm-ss):05-36

Claims 3, 4 and 5 are dependent upon Claim 1 and incorporates all the limitation of Claim 1. As shown above, independent Claim 1 is patentable over Gutman, Vu and the combination thereof. Furthermore, Higley does not teach or suggest the claimed combination of elements of independent Claim 1 as discussed above. Accordingly, Claims 3, 4 and 5 are also allowable by virtue of their dependency on Claim 1, as well as the additional elements they recite. Applicants therefore respectfully request that the §103(a) rejection of Claims 3, 4 and 5 be withdrawn and Claims 3, 4 and 5 be allowed.

Claim 6, as amended, recites a computer-readable medium having computer-executable instruction for a trusted security server to perform the steps:

- storing proxy authorization information from a user for authorizing a proxy client to act as a proxy of the user, **the proxy authorization information identifying an extent of proxy authorization granted the proxy client by the user;**

- receiving a proxy request from the proxy client to access a target service on behalf of the user;

- determining, based on the stored proxy authorization information of the user, whether to grant the proxy request;

- constructing a data structure containing authentication data recognizable by the target service for authenticating the proxy client for accessing the target service on behalf of the user, if it is determined to grant the proxy request.

Gutman does not teach or suggest "storing proxy authorization information from a user for authorizing a proxy client to act as a proxy of the user, the proxy authorization information identifying an extent of proxy authorization granted the proxy client by the user." Instead, those skilled in the art appreciated that Gutman suggests storing authorization information regarding the user. Specifically, Gutman discloses that the AAA server in the user's domain stores an IP address associated with the user, at col. 1, line 65 through col. 2, line 2. Furthermore, Gutman discloses that the ISP grants the user access to the network based upon the reply it gets back from the AAA server, at col. 2 lines 2-4. To be able to do this, the ISP server maintains information such as supported domain names of networks that the user can have access to, the IP address to which the authentication transaction is to be sent to, and the port number on the AAA server to which the authentication transaction is to be addressed, at col. 2, lines 6-10. The IP address provisioned by the AAA server and the domain identification entries maintained by the ISP are utilized by the ISP for authenticating the user (col. 2, lines 6-10) and granting access to the user to access the network (col. 2, lines 2-4). Accordingly, the information grants access to the user not the proxy server of the ISP.

Thus, Gutman does not teach or suggest "storing proxy authorization information from a user for authorizing a proxy client to act as a proxy of the user, *the proxy authorization information identifying an extent of proxy authorization granted the proxy client by the user.*" Furthermore, neither Vu nor Higley have been shown to teach or suggest "storing proxy authorization information from a user for authorizing a proxy client to act as a proxy of the user, the proxy authorization information identifying an extent of proxy authorization granted the proxy client by the user." Applicants therefore respectfully submit that Claim 6 is patentable over Gutman, Vu, Higley and the combination thereof. Accordingly, Applicants request that the §103(a) rejection of Claim 6 be withdrawn and Claim 6 be allowed.

With respect to **Claims 7, 8 and 10**, it is noted that independent Claim 6 is patentable over Gutman, Vu, Higley and the combination thereof for the above-advanced reasons. Consequently, Claims 7, 8 and 10 are also allowable by virtue of their dependency on Claim 6, as well as the additional elements they recite. Applicants therefore respectfully request that the §103(a) rejection of Claims 7, 8 and 10 be withdrawn and Claim 7, 8 and 10 be allowed.

Claim 9 stands rejected under 35 U.S.C. § 103 as being obvious in view of the combination of U.S. Patent No. 6,298,383 to Gutman, U.S. Patent No. 5,623,601 to Vu, U.S. Patent No. 5,913,025 to Higley and U.S. Patent No. 6,081,900 to Subramaniam. In response, the Applicant respectfully traverses the rejection.

Claim 9 is dependent upon Claim 6 and incorporates all the limitation of Claim 6. As shown above, independent Claim 6 is patentable over Gutman, Vu, Higley and the combination thereof. Furthermore, Subramanian has not been shown to teach or suggest the claimed combination of the elements of independent Claim 6 as discussed above. Accordingly, Claim 9 is also allowable by virtue of its dependency on Claim 6, as well as the additional elements it recites.

New Claims

New Claims 18-27 are provided for examination. Applicant believes that these claims are allowable over the prior art of record.

Conclusion

Applicants submit that the pending claims are in condition for allowance and respectfully requests that this application be allowed and forwarded on to issuance.

Respectfully Submitted,

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